UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

JEREMY AND CHELSEY ELLISON	§	
Plaintiff	§	
	§	
V.	§	CIVIL ACTION NO. 1:16-cv-00787-LY
	§	
CENTRAL MUTUAL INSURANCE	§	
COMPANY & AARON CAMP	§	
Defendants	§	

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, Jeremy and Chelsey Ellison, and Defendant, Central Mutual Insurance Company, jointly move to dismiss with prejudice all claims which either Plaintiffs or Defendant have asserted, or could have asserted, against each other in this lawsuit. In support of this motion, Plaintiffs and Defendant would show the following:

1.

Plaintiffs and Defendant would show that a settlement has been reached between Plaintiffs and Defendant as to all claims and matters involved in this lawsuit. As Plaintiffs and Defendant have settled all issues in this lawsuit as it relates between them, Plaintiffs and Defendant would now jointly move the Court to dismiss all claims Plaintiffs have asserted, or could have asserted, against Defendant, with prejudice to the refiling of same, and to dismiss all claims which Defendant has or could have asserted against Plaintiffs, with prejudice to the refiling of same.

For all of the above reasons, Plaintiffs and Defendant would jointly move the Court to issue an order of dismissal, dismissing all of Plaintiffs' claims asserted in this lawsuit, or which could have been asserted in this lawsuit, by Plaintiffs against Defendant, with prejudice to the refiling of same, and dismissing all claims which Defendant has or could have asserted in this lawsuit against

Plaintiffs, with prejudice to the refiling of same, with all costs of court to be borne by those parties who incurred them.

Respectfully submitted,

/s/Adam Q. Voyles
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CERTIFICATE OF SERVICE

This is to certify that on September 1, 2016, I electronically filed the foregoing document with the clerk of court for the U. S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Adam Q. Voyles, Attorney for Plaintiffs, Jeremy and Chelsey Ellison.

/S/Russell J. Bowman
Russell J. Bowman